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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW HAMPSHIRE

In re:

BRIAN J. GOODMAN, SR., Debtor.

Case No. 25-10233-KB

Chapter 13

DEBTOR'S MOTION TO EXTEND TIME TO COMPLY WITH MONETARY PROVISION OF ORDER DATED NOVEMBER 26, 2025 (ECF NO. 135), OR IN THE ALTERNATIVE, FOR A TEMPORARY STAY OF ENFORCEMENT PENDING CONTINUED HEARING

NOW COMES the Debtor, Brian J. Goodman, Sr., proceeding pro se, and respectfully moves this Honorable Court, pursuant to Fed. R. Bankr. P. 9006(b)(1), 11 U.S.C. § 105(a), and applicable Local Bankruptcy Rules, for an order extending the time to comply with Paragraph 1 of the Court's Order dated November 26, 2025 (ECF No. 135), or in the alternative, temporarily staying enforcement of that monetary provision pending the continued hearing scheduled for January 7, 2026.

I. Jurisdiction and Core Status

This Court has jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding, and the Debtor consents to entry of final orders by this Court.

II. Relevant Background

On November 26, 2025, the Court held a hearing on the Motion for Relief from Stay filed by U.S. Bank Trust Company, N.A. Following the hearing, the Court entered an Order requiring the Debtor to pay \$4,977.00 on or before December 22, 2025, and continued the hearing to January 7, 2026.

III. Cause Exists to Extend the Deadline

The Debtor was represented by counsel at the hearing but filed substantive pleadings the morning of the hearing that were not argued. Shortly thereafter, the Debtor terminated counsel and is now proceeding pro se. Due to this transition and current financial circumstances, the Debtor is unable to comply with the December 22 deadline but is acting in good faith.

IV. Alternative Request for Temporary Stay

In the alternative, the Debtor requests a narrow and temporary stay of enforcement of the monetary provision of the Order pending the January 7, 2026 continued hearing.

V. Good Faith

This Motion is filed in good faith and not for purposes of delay.

WHEREFORE, the Debtor respectfully requests that the Court extend the deadline or temporarily stay enforcement pending the January 7, 2026 hearing, and grant such other relief as is just.

Respectfully submitted.

Brian J. Goødman, Sr.

Debtor, pro se

CERTIFICATE OF SERVICE

I hereby certify that on the date below, a true and correct copy of the foregoing Motion was served by first-class mail and/or CM/ECF upon all parties entitled to notice, including counsel for U.S. Bank Trust Company, N.A., the Chapter 13 Trustee, and all other parties entitled to notice.

Brian J. Goodman, Sr.

Debtor, pro se

Dated: ___December 18, 2025______, 2025